

April 24, 2025

VIA Email to Court & ECF

Honorable Michael E. Farbiarz  
United States District Judge  
District of New Jersey  
U.S. Post Office & Courthouse  
Newark, New Jersey 07101

**Re: Khalil v. Trump, et al., No. 2:25-cv-1963 (MEF) (MAH)**

Dear Judge Farbiarz:

The parties write jointly in response to the Court's text order from yesterday, ECF 209, requesting transmittal of evidence that has been filed in the immigration court proceedings but which has not yet been provided to the Court. Those filings, attached hereto, are:

- (1) Additional Evidence and Document List for Mr. Khalil Refuting the Charges Against Him in the Notice to Appear and Firm I-261.
- (2) U.S. Department of Homeland Security's Opposition to Mr. Khalil's Motion to Terminate
- (3) Petitioner's Reply In Support Of Motion to Terminate Removal Proceedings Based on Egregious Fourth Amendment Violations.
- (4) Document List and Preliminary Evidence Filed In Support Of Mr. Khalil's I-589, Application for Asylum and for Withholding of Removal.

Respectfully submitted,

/s/ Baher Azmy

AMERICAN CIVIL LIBERTIES UNION OF NEW JERSEY FOUNDATION  
Jeanne LoCicero  
Farrin R. Anello  
Molly K.C. Linhorst  
570 Broad Street, 11th Floor  
Newark, New Jersey 07102  
973-854-1715

CENTER FOR CONSTITUTIONAL RIGHTS  
Baher Azmy  
Samah Sisay\*  
Diala Shamas\*  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6464

CLEAR PROJECT  
MAIN STREET LEGAL SERVICES, INC.

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION  
Amy Belsher\*  
Robert Hodgson\*  
Veronica Salama\*  
Molly Biklen\*  
125 Broad Street, 19th Floor  
New York, N.Y. 10004  
Tel: (212) 607-3300

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
Omar Jadwat  
Noor Zafar\*  
Sidra Mahfooz\*  
Brian Hauss\*  
Esha Bhandari\*  
Vera Eidelman\*  
Tyler Takemoto\*  
Brett Max Kaufman\*  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel: (212) 549-2500

Ramzi Kassem\*  
Naz Ahmad  
Shezza Abboushi Dallal\*  
CUNY School of Law  
2 Court Square  
Long Island City, NY 11101  
Tel: (718) 340-4558

WASHINGTON SQUARE LEGAL SERVICES, INC.  
Alina Das\*  
Immigrant Rights Clinic  
245 Sullivan Street, 5th Floor  
New York, New York 10012  
Tel: (212) 998-6430

DRATEL & LEWIS  
Amy E. Greer  
29 Broadway, Suite 1412  
New York, NY 10006  
Tel: (212) 732-8805  
Fax: (212) 571-3792

VAN DER HOUT LLP  
Marc Van Der Hout (CA Bar #80778)\*  
Johnny Sinodis (CA Bar #290402)\*  
Oona Cahill (CA Bar #354525)\*  
360 Post St., Suite 800  
San Francisco, CA 94108  
Tel: (415) 981-3000  
Fax: (415) 981-3003

*Counsel for Petitioner*

\* *Appearing Pro hac vice*

YAAKOV M. ROTH  
Acting Assistant Attorney General  
Civil Division

DREW C. ENSIGN  
Deputy Assistant Attorney General

SARAH S. WILSON  
Assistant Director

s/ Dhruman Y. Sampat  
DHRUMAN Y. SAMPAT  
Senior Litigation Counsel  
Office of Immigration Litigation  
General Litigation and Appeals Section  
PO Box 878, Ben Franklin Station  
Washington, D.C. 20044  
[dhruman.y.sampat@usdoj.gov](mailto:dhruman.y.sampat@usdoj.gov)  
*Counsel for Respondents*